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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012

DOCKET NO. N2012-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY (APWU/USPS-T6-2)

The United States Postal Service hereby provides its response to the above-listed interrogatory of the American Postal Workers Union, AFL-CIO (APWU) dated January 27, 2012. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY

APWU/USPS-T6-2. On page 13 of your testimony you state "[t]o the extent that HCRs can provide the needed transportation at a lower cost than PVS transportation, the Postal Service will save additional costs." For the following HCR contracts please provide the: PS Form 7405, PS Form 7409, PS Form 4533, PS Form 5443 and the annual hours for each.

| 956L4 | 956L2 | 956L5 | 956L3 |
|-----------------|-----------------|----------|--------|
| 959A3 | 95934 | 95936 | 95938 |
| 95939 | 95948 | 95981 | 959L0 |
| 94690 | 45612B | 320AG | 320BG |
| 320CG | 320AK (A and B) | 32015 | 32039 |
| 32132 | 32135 | 32136 | 32145 |
| 32146 (A and B) | 32148 | 32169 | 321AA |
| 321AE | 321L0-A | 321L0-B | 321L2 |
| 328GE | 27OU0 | 28634 | 28635 |
| 28636 | 28637 | 28647 | 28664 |
| 28667 | 28672 | 28680 | 286A1 |
| 286A5 | 286L0 | 286L1 | 286L3 |
| 541XX | 53017 | 540L1 | 541A7 |
| 541L4 | 541A5 | 541CD | 541L0 |
| 541L3 | 54110 | 54130 | 54131 |
| 54132 | 54133 | 54134 | 54136 |
| 54173 | 541L2 | 530BK(B) | 53015 |
| 75196A | 75393A | 75395A | 76315A |
| 76331A | 76332A | 76333A | 76334A |
| 76335A | 76336A | 76365A | 763AAA |
| | | | |

RESPONSE:

The responsive documents are contained in USPS-LR-N2012-1/72. Please note that the following contracts were terminated for convenience: 320CG, 32135, 321AE, 76315, 76331, 76332, 76333, 76335, and 763AA and the records are no longer available. Additionally, 76336 and 45612 refer to expired contracts and the HCR Id. No. 541XX is invalid. Please also note that PS Form 4533 contains the schedule for PVS drivers and is therefore inapplicable to the HCR contracts identified in the interrogatory. For each HCR Id. No., I am providing the associated "Statement of Schedule and Service." The Statement of Schedule and Service contains the following information for each route: termini (i.e., origin

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY RESPONSE TO APWU/USPS-T6-2 (CONT.):

and destination), number of trips, stops, annual hours and miles, frequency of operation, and total trip miles.

PS Forms 7405 and 7409 were unavailable for the majority of the highway contract routes listed in the interrogatory because the retention period for such documents had expired and the documents could not be located. For each contract route for which such forms were not available, I am providing the following forms instead: PS Form 7447 (Transportation Services Renewal Contract for Regular Service) and PS Form 7448 (Notice of Renewal of Transportation Services Contract for Regular Service). These substitute forms contain substantially the same information that would have been included in the PS Forms 7405 and 7409 (e.g., origin, destination, contract term, rate of compensation, and supplier).